

1301 PENNSYLVANIA AVENUE, NW SUITE 1100 WASHINGTON, DC 20004-1707 202.626.4000 www.airlines.org

 James C. May President and CEO

September 8, 2009

Dear Air Cargo Shipper,

As you know, the congressionally mandated August 2010 deadline for the air cargo industry to screen **100 percent of** *all* **cargo** on passenger planes is rapidly approaching. In February, we met the deadline to screen 50 percent of all cargo but, as all of us in the industry are aware, meeting the requirements to screen 100 percent of all cargo will be substantially more challenging.

This mandate will require the focused effort of all parties involved in the supply chain – from manufacturers and shippers to forwarders and carriers. A key aspect to successful compliance with the mandate is the Certified Cargo Screening Program (CCSP), which allows shippers and forwarders to screen at their facilities. Since no unscreened cargo will be allowed onboard a passenger aircraft after August 2010, those shippers that do not participate in CCSP will have to submit their cargo to forwarders, airlines or other third parties for screening.

To date, airlines have been able to screen shipments from customers who have not yet qualified for participation in the CCSP program. However, as we transition from meeting last February's requirement that 50 percent of all shipments be screened, to the pending 100 percent screening deadline, screening capacity, time constraints and other factors raise concerns that non-CCSP shipments will face delays. Given the volume of shipments involved, any effort that seeks to centralize the entire screening process at the airports would likely result in unacceptable delays for shippers.

The CCSP solves this problem by spreading the security process across the supply chain. This not only allows manufacturers to maintain control over the integrity of their products; it also offers the advantage of bypassing potential bottlenecks at airports that could undermine the efficient delivery of products.

However, time to implement this program is running short. We must expand participation by shippers and forwarders, as well as extend the CCSP beyond the initial pilot cities if the shipping

community is to be assured of meeting the fast-approaching 100 percent deadline without experiencing supply chain disruption.

As air carriers, we believe that we must work in cooperation with our partners in the shipping and forwarding sectors to communicate the CCSP options and educate the air cargo community about its benefits now, as this program will take months to implement throughout the industry. If too many participants wait until next year, the Transportation Security Administration (TSA) will unlikely be able to process all of the requests in a limited time frame, resulting in potential delays for shippers. The risks are particularly high for businesses that ship special commodities, many of which were previously allowed to be transported without being subjected to full physical screening processes. Sealed shipments of pharmaceuticals, high-tech commodities, perishables and any commodity transported on shrink-wrapped or banded skids or pallets on wide-body aircraft will be affected by the new TSA requirements.

The TSA is offering benefits to shippers and forwarders that sign up this year. Benefits for early participation include:

- Free on-site facility assessments by TSA
- Extended period of time (90 days) to review regulatory documents before committing
- Free Security Threat Assessments for up to 200 individuals per facility
- Free TSA consultation services site visits, step-by-step guidance through certification, etc.
- Deferred screening start date option

We have heard that many companies currently participating in programs such as C-TPAT, TAPA, USDA/FDA Good Importer Practices and other types of initiatives are finding the CCSP certification process to be more like a small step than a giant leap. We believe that the CCSP offers our customers the best solution to meeting the 100 percent screening mandate – in a way that maintains control in the private sector and offers maximum security with minimal disruption in the supply chain.

We appreciate your interest in this critical program and urge you to contact the TSA immediately to find out about the CCSP, what it would take for you to become a certified participant and what benefits are available to participants.

To contact TSA directly for more information and to inquire about participating in CCSP, you can e-mail CCSP@dhs.gov.

The 100 percent mandate is a challenge for all of us. We hope that you will join us in working to meet that mandate efficiently and on time.

Sincerely,